

FILED
10/7/2024

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~~1:24-cr-00467~~

Judge Sara L. Ellis
Magistrate Judge Gabriel A. Fuentes
RANDOM/ CAT. 4

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JEREMY KOONCE

Case No.

Violation: Title 18, United States Code,
Section 922(g)(1) and Title 21, United
States Code, Section 841(a)(1)

COUNT ONE

The SPECIAL NOVEMBER 2023 GRAND JURY charges:

On or about May 31, 2023, at Chicago, in the Northern District of Illinois,
Eastern Division,

JEREMY KOONCE,

defendant herein, did knowingly and intentionally distribute a controlled substance,
namely, a mixture and substance containing a detectable amount of cocaine base, a
Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

The SPECIAL NOVEMBER 2023 GRAND JURY charges:

On or about June 21, 2023, at Chicago, in the Northern District of Illinois,
Eastern Division,

JEREMY KOONCE,

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a Glock, Model 43, 9mm pistol, bearing serial number AGDU061, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

The SPECIAL NOVEMBER 2023 GRAND JURY charges:

On or about June 21, 2023, at Chicago, in the Northern District of Illinois,
Eastern Division,

JEREMY KOONCE,

defendant herein, did knowingly and intentionally distribute a controlled substance,
namely, a mixture and substance containing a detectable amount of cocaine base, a
Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

The SPECIAL NOVEMBER 2023 GRAND JURY charges:

On or about July 6, 2023, at Chicago, in the Northern District of Illinois,
Eastern Division,

JEREMY KOONCE,

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a Smith & Wesson, M&P 9 Shield, 9mm pistol, bearing serial number HYZ4952, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2023 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), as set forth in this Indictment, defendant shall forfeit to the United States of America any firearms and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a Glock, Model 43, 9mm pistol, bearing serial number AGDU061; a Smith & Wesson, M&P 9 Shield, 9mm pistol, bearing serial number HYZ4952; and associated ammunition.

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY